

EXHIBIT A

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SUSIE JORDAN, as Parent and
Guardian Ad Litem of A.E.J. (a
minor) and B.A.J. (a minor), and
SUSIE JORDAN, individually,

Case No. 1:22-cv-12

Plaintiff,

v.

CHATHAM COUNTY SCHOOLS,
in its official capacity; DAN
BARNWELL; G. DOE (a minor);
M. DOE (a minor); GYM
TEACHER DOE A; GYM
TEACHER DOE B; DOES 1
through 20,

Defendants.

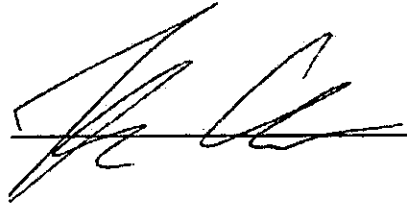
NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in
support of this motion and the Certificate(s) of Good Standing annexed

thereto, I, Keith Altman, will move this Court pursuant to Rule 83.1 of the Local Rules of the United States District Courts for the Middle District of North Carolina for an order allowing the admission of movant, a member of the firm of the Law Office of Keith Altman and a member in good standing of the bar(s) of the State(s) of California and Michigan, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Plaintiffs. There are no pending disciplinary proceedings against me in any state or federal court.

Date: March 21, 2022

Respectfully Submitted,

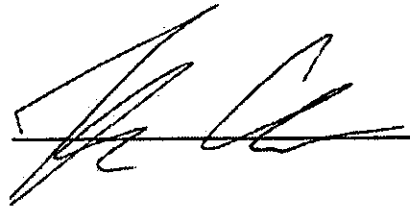
A handwritten signature in black ink, appearing to be 'Keith Altman', written over a horizontal line.

Keith Altman *Pro Hac Vice to be Applied For*
Law Office of Keith Altman
33228 West 12 Mile Road, Suite 375
Farmington Hills, Michigan 48331
Telephone: (248) 987-8929
keithaltman@kaltmanlaw.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2022, I served the foregoing document on Defendants of record via email.

NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE

A handwritten signature in black ink, appearing to be 'K. Altman', written over a horizontal line.

Keith Altman, Esq.

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SUSIE JORDAN, as Parent and
Guardian Ad Litem of A.E.J. (a
minor) and B.A.J. (a minor), and
SUSIE JORDAN, individually,

Case No. 1:22-cv-12

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CHATHAM COUNTY SCHOOLS,
in its official capacity; DAN
BARNWELL; G. DOE (a minor);
M. DOE (a minor); GYM
TEACHER DOE A; GYM
TEACHER DOE B; DOES 1
through 20,

Defendants.

**AFFIDAVIT IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE**

I, Keith Altman, being duly sworn, hereby depose and say as follows:

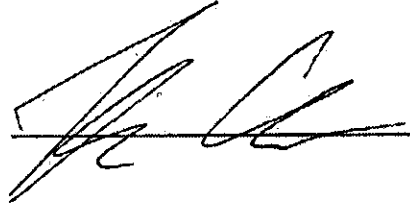
AFFIDAVIT IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE

1. I am a member of the Law Office of Keith Altman.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificates of Good Standing attached hereto, I am a member in good standing of the State Bars of California (SBN 257309) and Michigan (SBN P81702).
4. I request a waiver of the requirement of local counsel. It has been nearly impossible to find local counsel to assist Plaintiffs with this lawsuit.
5. There are no pending disciplinary proceedings against me in any state or federal court.
6. I have not been convicted of a felony.
7. I have not been censured, suspended, disbarred, or denied admission.

WHEREFORE, your affiant respectfully requests that he be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned case, appearing for Plaintiffs.

Date: March 20, 2022

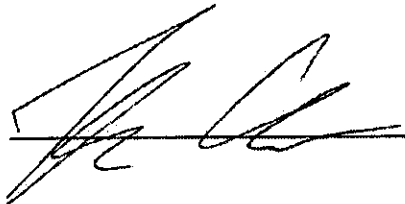
Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'K. Altman', written over a horizontal line.

Keith Altman *Pro Hac Vice to be Applied For*
Law Office of Keith Altman
33228 West 12 Mile Road, Suite 375
Farmington Hills, Michigan 48331
Telephone: (248) 987-8929
keithaltman@kaltmanlaw.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2022, I served the foregoing document on Respondent of record via email.

A handwritten signature in black ink, appearing to be 'K. Altman', written over a horizontal line.

Keith Altman, Esq.



Supreme Court of California

JORGE E. NAVARRETE
Clerk and Executive Officer of the Supreme Court.

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

KEITH L. ALTMAN

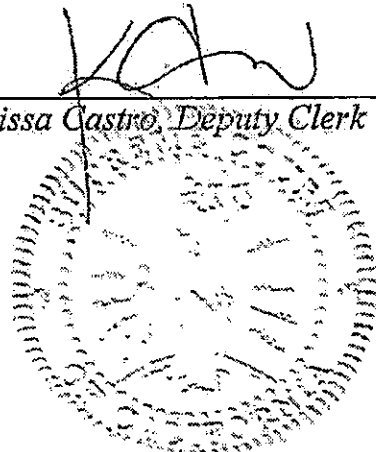
I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that Keith L. Altman, #257309, was on the 25th day of August 2008, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 28th day of January 2022.*

JORGE E. NAVARRETE
Clerk/Executive Officer of the Supreme Court

By: _____

Karissa Castro, Deputy Clerk



Certificate of Good Standing

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

I, JEANNETTE J. CLACK, Clerk of the United States District Court, Western District of Texas, DO HEREBY CERTIFY that Keith Altman, Bar #257309, was duly admitted to practice in said Court on 10/27/2021, and is in good standing as a member of the bar of said Court.

Signed at San Antonio, Texas on 2/22/2022.



JEANNETTE J. CLACK, Clerk

BY: *Roni L. Appelt*

THE SUPREME COURT of the STATE OF MICHIGAN

I, Larry S. Royster, Clerk of the Michigan Supreme Court and Custodian of
the Roll of Attorneys admitted to the practice of law in this state, do hereby
certify that, as appears from the records,

Keith Altman

was admitted to the practice of law in the courts of the State of Michigan on

June 21, 2017

and has remained in good standing since then.

In Testimony Whereof, I set my hand and
affix the seal of the Michigan Supreme
Court on this date: February 22, 2022

A handwritten signature in black ink, appearing to read "Larry S. Royster", is written over a horizontal line.

Clerk

